

SPRING 1993

Ontario's new 3Rs regulations: Backgrounder

INTRODUCTION

On April 29, 1993, Minister of Environment and Energy Bud Wildman announced the Ontario Government's intent to implement a set of five new waste reduction regulations into law in August 1993. Known as the 3Rs regulations, they will define the mandatory rules and requirements for reduction, reuse and recycling activities in the province.

Summary

- All regulations apply only to non-hazardous solid waste from residential and industrial, commercial and institutional (IC&I) sources.
- Residential recycling and backyard composting programs will be required to be provided by all municipalities with a population of 5,000 or more.
- Leaf and yard waste composting will be required to be provided by municipalities of 5,000 or more which currently have a leaf and yard waste collection program. Leaf and yard waste collection and composting will be required in municipalities of 50,000 or more in population whether or not they currently have a leaf and yard waste collection program.
- Annually updated waste audits, waste reduction workplans and recycling programs will be required for major waste generators in designated industrial, commercial and institutional sectors.

- Packaging audits, updated every two years, and packaging reduction workplans will be required for major packaging users and importers in designated food, beverage, paper or chemical manufacturing sectors.
- Recycling facilities may be eligible for exemptions from Certificate of Approval requirements under the Environmental Protection Act, provided that certain standards are met.

Implementation

The ministry consulted widely on the 3Rs regulatory measures and is now implementing specific regulations resulting from these consultations. The implementation phase will be in three steps:

Notice of Intent

The first step begins with the publication of a notice of intent and ends after a 90-day period (July 31, 1993). The ministry wants to ensure that those directly affected by the 3Rs regulations are able to prepare for any actions they will be required to take. Specific details of the regulations are being made available during this first stage.

Promulgation

The second step is the filing of the 3Rs regulations with the Registrar of Regulations. The regulations become law on the date they are filed and those affected must begin to take steps to comply. Soon after they are filed, the regulations will be published in the Ontario Gazette.



96936000009018

Copyright Provisions and Restrictions on Copying:

This Ontario Ministry of the Environment work is protected by Crown copyright (unless otherwise indicated), which is held by the Queen's Printer for Ontario. It may be reproduced for non-commercial purposes if credit is given and Crown copyright is acknowledged.

It may not be reproduced, in all or in part, for any commercial purpose except under a licence from the Queen's Printer for Ontario.

For information on reproducing Government of Ontario works, please contact ServiceOntario Publications at copyright@ontario.ca

Compliance

Setting compliance deadlines is the third step of the implementation process. The date that the regulations come into force will be used as the base date for the compliance deadlines, which will be included in the regulations. Most of the provisions will begin to apply about six to 12 months from the date the regulations are promulgated.

Background

The new 3Rs regulations are part of Ontario's Waste Reduction Action Plan, announced in February 1991. The action plan is the basic road map for reaching Ontario's waste reduction targets: at least a 25 per cent reduction in waste going to disposal by the end of 1992, and at least a 50 per cent reduction by the year 2000. The waste reduction targets are based on a reduction from 1.0 tonnes per person of solid waste sent to disposal in 1987 by all Ontario households, industries, businesses and institutions.

The 1992 target has been achieved through the

efforts of hundreds of municipalities, thousands of businesses, industries, schools, hospitals and government offices, and more than three million Ontario households. Having come this far, however, it is still easy to lose sight of how much more has to be done to achieve the 50 per cent target by the year 2000. That's why some rules and guidelines are necessary to keep the province on course.

Details of the regulations were first described in *Initiatives Paper No. 1: Regulatory Measures to Achieve Ontario's Waste Reduction Targets*, released for 60-day public consultation in October 1991. The consultation period was extended for another 30 days in December 1991. A total of 344 submissions were received from municipalities, affected IC&I, environmental, labor and community groups, and private citizens. Additional consultation took place during public hearings on the *Waste Management Act* (Bill 143) in January-April 1992. Informal consultation with affected groups continued into winter and spring 1993.

IMPLEMENTATION SCHEDULE

<i>Required actions</i>	<i>Affected parties</i>	<i>Effective date</i>
Residential recycling programs	Municipalities in Southern Ontario	July 1, 1994
	Municipalities in Northern Ontario *	July 1, 1996 <i>Note: Date changes to July 1, 1995 if depot system is chosen for residential recycling program (see page 3).</i>
Backyard composting, leaf and yard waste composting	Municipalities in Southern Ontario	July 1, 1994
	Municipalities in Northern Ontario *	July 1, 1995
Waste audits and waste reduction workplans	Designated major IC&I waste generators	six months from date of promulgation **
IC&I recycling programs	Designated major IC&I waste generators	12 months from date of promulgation
Packaging audits and packaging reduction workplans	Designated major packaging users	six months from date of promulgation
Rules for establishing recycling sites	Owners/operators of recycling sites	At date of promulgation

* Territorial districts of Algoma, Cochrane, Kenora, Manitoulin, Nipissing, Parry Sound, Rainy River, Sudbury, Thunder Bay, Timiskaming and the Regional Municipality of Sudbury

** Special conditions apply to designated construction and demolition projects (See note on page 5.)

MUNICIPAL 3Rs PROGRAMS

Source separation (recycling) programs

All local municipalities of 5,000 or more in population will be required to establish and maintain source separation programs (Blue Box waste management systems). The programs must include the following:

- All properties serviced by a municipal garbage collection operation must have access to a reasonably equivalent recycling collection service.
 - If garbage is collected at a depot, then recyclable materials must also be collected at the depot.
 - If garbage is collected at the curbside, then recyclable materials must also be collected at the curbside.

- If garbage is accepted at a waste disposal site, then recyclable materials must also be accepted at the site.
- Municipalities between 5,000 and 15,000 population in Northern Ontario may choose a depot system regardless of the type of garbage collection operation. *However, if this option is chosen, it must be implemented by July 1, 1995.*
- Frequency of curbside Blue Box collection is at least half that of curbside garbage collection. For example, if garbage is picked up once a week, then recyclables must be picked up within at least every two weeks.

MATERIALS TO BE COLLECTED BY MUNICIPAL SOURCE SEPARATION (RECYCLING) PROGRAMS

BASIC LIST

All materials mandatory

SUPPLEMENTARY LIST

At least two materials are mandatory

ADDITIONAL MATERIALS

- | | | |
|---|--|---|
| <ul style="list-style-type: none">- Newsprint- Food and beverage containers made of:<ul style="list-style-type: none">• aluminum• glass• steel• PET | <ul style="list-style-type: none">- Aluminum foil- Boxboard and paper board- Corrugated cardboard- Fine paper- Foam plastics- Magazines- Plastic film- Paper cups and plates- Rigid plastic containers- Telephone directories- Textiles (excluding fibreglass, carpet) | <ul style="list-style-type: none">- Brick- Concrete- Glass- Gypsum- Leather- Metal- Paper- Plastic- Textiles- Wood |
|---|--|---|
-

- All recyclable materials on the basic list are collected plus at least two materials from the supplementary list. A municipality may include additional materials from a schedule of source separated materials in the regulations. Commingling, that is, collecting separated materials in a common compartment, is allowed.
- Measures are implemented to ensure materials are separated properly.
- Collected recyclables are transported to a municipal waste recycling site, to an end-user, a distributor who sends the materials to end-users, or to a waste disposal site.
- Reasonable efforts are made to ensure that the collected materials are recycled.
- Residents are provided with instructions on proper procedures for source separation and feedback on how much material is being diverted from landfill. A communications program should also encourage residents to participate in the recycling program.
- An annual report is submitted to the ministry, describing types and amounts of materials collected and diverted from disposal.

Backyard composting programs

Municipalities with a population of 5,000 or more will be required to implement a residential backyard composting program. The program must include the following:

- The provision of home composters to residents by the municipality at cost or less.
- The provision of information to residents publicizing the availability of home composters and explaining their proper use and installation. A communications program should also encourage home composting.

Leaf and yard waste collection and composting

Municipalities with a population of 5,000 or more will be required to compost leaf and yard wastes if they currently have a collection program for these materials. Municipalities with a population of 50,000 or more will be required to implement a leaf and yard waste collection system, even if one is not currently in place, and compost the collected materials. A leaf and yard collection and composting program must include the following:

- Curbside collection of leaf and yard waste, or the provision of depots for receiving leaf and yard wastes, or a combination of both.
- Transportation of the leaf and yard waste to a leaf and yard waste composting site.
- The provision of a leaf and yard waste composting site or the services of another such site.
- Reasonable efforts are made to ensure that the compost produced is used as a soil conditioner.
- Collected leaf and yard wastes are composted at a leaf and yard composting site or other composting site, applied directly to land by the operator of the system, or transported to a person who will directly apply the materials to land.
- The capacity of the leaf and yard waste system must be sufficient to deal with the anticipated quantity of leaf and yard waste.
- A communications program is implemented to promote public participation in leaf and yard composting programs.
- An annual report is submitted to the Ministry of Environment and Energy, describing the leaf and yard system and the amount of waste collected, accepted, composted or applied to land.

IC&I WASTE REDUCTION PROGRAMS

Major IC&I waste generators

As described in the table on page 6, major waste generators are large establishments in designated industrial, commercial and institutional sectors. They represent large, non-residential sources of waste.

A large establishment within an IC&I sector is designated based on minimum size criteria such as building area or number of employees. Any establishment which is equal to or above the minimum size criteria must implement waste audits, waste reduction workplans and a source separation program.

In addition, owners of multi-unit residential buildings with six or more dwelling units are required to implement a source separation program.

Waste audits and waste reduction workplans

Doing a waste audit and preparing a reduction workplan are two complementary activities that deal with the measurement and reduction of waste.

Waste audits

A waste audit is a study that addresses the amount, nature and composition of waste and the manner by which it gets produced, including the extent to which materials or products used or sold consist of recycled or reused material.

The audit also assesses management decisions and policies that relate to the production of waste such as procurement policies and specifications for raw materials, supplies and equipment. The audit looks at the reasons for the policies and how they can be modified to facilitate 3Rs actions and assists the generator in identifying opportunities to introduce 3Rs activities.

If the designated waste generator is responsible for several establishments with similar activities – for example a restaurant chain or schools under a school board – then a single waste audit can be conducted.

The initial waste audit must be updated annually. A new owner or operator of a facility is not required to conduct a new waste audit if an audit was prepared by a previous owner or operator.

Waste reduction workplans

A waste reduction workplan consists of an organized set of activities developed in response to the information gathered during the waste audit. The plan must include reasonable ways to reduce, reuse and recycle waste, responsibilities for implementation, timing and expected results.

The workplan also must be updated on an annual basis. If objectives are not met, the reasons can be determined and evaluated in the annual workplan review. Suitable modifications to the workplan can then be implemented.

As part of its implementation, the workplan is communicated to employees or people who work at a particular facility. A summary of the plan is posted so that it is visible to employees. Both the waste audit and the waste reduction workplan must be kept on file for five years.

NOTE: Construction and demolition projects started before the regulation came into force have a compliance deadline of six months to implement the waste audit and workplan requirements. However, the audit and the workplan need not cover waste generated during this six-month period. As well, projects completed before the end of the six-month period are exempt from the waste audit and workplan requirements.

Source separation (recycling) programs

Designated major IC&I waste generators are required to implement a source separation program for specified recyclable materials which can reasonably be anticipated. Additional materials may be included from the schedules of source separated materials which apply to municipal source separation programs (see page 3).

As part of the source separation program, collection, handling and storage facilities must be provided for these materials. The generator must make reasonable efforts to ensure full use of the program and that source separated materials are reused or recycled.

The source separation program also must have a communications component to instruct employees and users of the program on how to source separate, which materials are to be collected and in what form the materials must be prepared. The communications

MAJOR IC&I WASTE GENERATORS DESIGNATED UNDER THE 3Rs REGULATIONS

IC&I FACILITY/PROJECT	MINIMUM SIZE
RETAIL SHOPPING ESTABLISHMENTS applies to owner of establishment that sells goods or services at retail to persons who come to the establishment	10,000+ m ² in floor area or occupies space in a designated retail complex and solely responsible for its own waste management
RETAIL SHOPPING COMPLEXES applies to owner of a complex that contains premises occupied by retail shopping establishments	10,000+ m ² in total floor area
CONSTRUCTION PROJECTS applies to person who, on his/her own behalf or on behalf of another person, undertakes construction of one or more buildings including residential, industrial, commercial or institutional buildings.	Construction projects 2,000+ m ² in total floor area
DEMOLITION PROJECTS applies to person who, on his/her own behalf or on behalf of another person, undertakes demolition of one or more buildings including residential, industrial, commercial or institutional buildings.	Demolition projects 2,000+ m ² in total floor area
OFFICE BUILDINGS applies to owner of building used for offices	10,000+ m ² in total floor area for offices
* RESTAURANTS applies to owner of a restaurant, including take-out, where food or beverages are prepared on site and offered for immediate sale to the public; does not apply to restaurants which co-operate in waste audits in retail complexes, office buildings, hotels/motels, hospitals, educational institutions.	10+ full-time employees and/or equivalent in part-time employees.
HOTELS AND MOTELS applies to owners of facilities with sleeping accommodations for temporary stays, including inns, resorts or hostels.	75+ units
HOSPITALS applies to operators of hospitals as defined under the <i>Public Hospitals Act</i>	Class A, B or F in Regulation 964, RRO 1990.
* EDUCATIONAL INSTITUTIONS applies to operators of public and private elementary, secondary, or vocational schools; training academies; colleges and universities; also any business facilities that are used for education	350+ enrolled students during calendar year at a location or campus
* MANUFACTURING ESTABLISHMENTS applies to owners of a manufacturing establishment	100+ full-time employees and/or equivalent in part-time employees.

* Designated facilities which drop below the minimum size in a calendar year remain designated under the regulations for another two years.

component also provides information to promote the program and feedback on the amounts of materials diverted as a result of the program.

Multi-unit residential buildings

Owners of multi-unit residential buildings, with six or more dwelling units, are required to provide a source separation program. The materials to be collected include: food and beverage containers made of aluminum, glass, steel or PET; newsprint; and other types of materials which are collected in the local municipal Blue Box program.

MATERIALS TO BE SOURCE SEPARATED BY DESIGNATED MAJOR IC&I WASTE GENERATORS

<i>Facilities/projects</i>	<i>Materials to be source separated</i>
Construction projects	corrugated cardboard, wood, drywall, steel, concrete, brick
Demolition projects	wood, steel, concrete, brick
Manufacturing establishments	corrugated cardboard, wood, steel, fine paper, newsprint, aluminum, glass, plastic *
Retail shopping establishments and complexes, office buildings, hospitals, education institutions	corrugated cardboard, fine paper, newsprint, and food and beverage containers made of aluminum, glass or steel
Hotels, motels, restaurants	corrugated cardboard, fine paper, newsprint, and food and beverage containers made of aluminum, glass, PET or steel

* HDPE jugs, pails, crates, drums; LDPE film; EPS foam; PS trays, reels, spools

PACKAGING REDUCTION PROGRAMS

Packaging refers to all materials used to protect, contain or transport a product. It also includes materials which are physically attached to a product or its container for the purposes of marketing and communications.

The regulation designates *major packaging users* to conduct *packaging audits* and *packaging reduction workplans*. The audit and the reduction workplan account for all the types and amounts of packaging in the user's products.

Major packaging users

Large establishments in four manufacturing sectors, and importers of products in these same sectors have been designated as major packaging users.

DESIGNATED MAJOR PACKAGING USERS

MAJOR PACKAGING USER *	MINIMUM SIZE
Food manufacturing establishments	100+ full-time employees and/or equivalent part-time employees
Beverage manufacturing establishments	
Paper and allied product industry establishments**	
Chemical and chemical product industry establishments	
Importers	\$ 20,000,000+ cost to importer of the food, beverage, paper or chemical categories in the previous calendar year.

* Designated packaging users which drop below the minimum size in a calendar year remain designated under the regulations for another two years; importers for another three years.

** Not including printed material

Packaging audit

A *packaging audit* is an examination of the impact of packaging on waste management needs, activities and opportunities. More specifically, the packaging audit must address the following:

- Practices for obtaining and using packaging.
- Types and quantities of packaging used in the products.
- Reusability or recyclability of a particular choice of packaging.
- Extent of reused packaging.
- Recycled content of packaging.
- Environmental impact of packaging that becomes waste.

The audit identifies the links between these activities. For example, practices for obtaining and using packaging influence the design, specification and selection criteria that determine the type and amount of packaging used. The audit helps determine which of the factors in these practices can incorporate 3Rs.

Finally, the audit examines the fate of packaging following its normal distribution pattern. This accounts for the amount of packaging which is reused, recycled or disposed of after it has reached the consumer.

Packaging reduction workplan

The *packaging reduction workplan* uses information collected from the audit to reduce the amount of waste resulting from packaging. The workplan evaluates the opportunities for 3Rs implementation highlighted by the audit.

The workplan must include, to the extent that is reasonable, actions which help to ensure:

- A reduction in the amount of packaging used.
- An increase in reused or recycled content of the packaging used.
- An increase in the reusability and recyclability of the packaging used.
- A reduction in the environmental impact of packaging that becomes waste.
- A reduction in the burden of waste on consumers.

The workplan must identify implementation responsibilities, timing and expected results. A review of the audit and workplan must be done at least every two years. Suitable modifications to the workplan can then be implemented. A summary of the workplan must be posted so that it is visible to employees. The packaging audit and packaging reduction workplan must be submitted, on request, to the Ministry of Environment and Energy within seven days of the request.

Additional rules for designated manufacturers

Manufacturers of brand-name products under licence or other contractual arrangements with an owner of the brand name, shall seek the co-operation of the brand-name owner in the preparation of a packaging reduction workplan. The workplan must identify the names of the persons from whom the manufacturer sought co-operation, and a description of the co-operation received.

Additional rules for designated importers

In preparing a packaging reduction workplan, an importer must consider changing buying policies and seeking the co-operation of the persons from whom the importer buys products. The workplan must identify the names of the persons from whom the importer sought co-operation, and a description of the co-operation received.

RECYCLING FACILITIES

The *3Rs regulations* will make it easier to establish a recycling site for source separated waste, while maintaining strong safeguards for protecting the environment. This will also accelerate the development of recycling capacity and complement other regulatory measures for municipal and IC&I recycling programs.

New approvals process

Currently, Part V of the *Environmental Protection Act* (EPA) requires all sites which handle waste, whether they process it or dispose of it, to obtain a Certificate of Approval. Recycling facilities also require a Certificate of Approval because they handle materials which are wastes or are derived from wastes.

Under the new *3Rs regulations*, a recycling site or depot is exempt from obtaining a Certificate of Approvals for waste disposal if the proponent meets certain siting requirements. As well, certain operating requirements must be met once the recycling site is in operation. Failure to meet these requirements would be an offence under the *Environmental Protection Act*.

The regulations designate three types of recycling facilities: *municipal waste recycling sites, leaf and yard waste composting sites and municipal waste recycling depots*.

Municipal waste recycling sites

A *municipal waste recycling site* is a facility that accepts only materials (source separated or commingled), as listed in the schedules of source separated waste in the *3Rs regulations*, and transfers them, with or without processing, to secondary material markets for recycling into new products. Processing activities can include only: sorting, grading, sizing, cleaning, drying, deinking, size reduction, pulping, composting, baling, packaging or pelletizing.

To be exempt from obtaining a waste disposal site Certificate of Approval, a municipal waste recycling site must have all buildings, processing and storage areas at least 50 metres from its property line.

Operational requirements

- Processed materials must be shipped directly to a user of the materials, a distributor, another municipal waste recycling site or a waste disposal site.
- Amount of materials allowed on site must, if there is processing:
 - be no more than 15 times the capacity for material that the site is designed to process on a daily basis; and
 - total amount of incoming, outgoing, and in process materials must not exceed three times the monthly processing capacity or 2000 m³, whichever is greater
- No more than 2000 m³ of materials are allowed on site if there is no processing capacity.
- Residual or leftover waste from processing recyclables must be less than 10 per cent of the dry weight of incoming waste materials averaged over a six-month period; and must be removed promptly for disposal.
- Reasonable care must be exercised to control dust, litter, odour, noise, rodents and other pests.
- Specific site plans, operational plans, emergency response plans and contingency plans must be developed and kept at the site until it ceases to operate.
- Records, which must be maintained on site for at least two years, must detail the types, quantities, sources, markets, processing and treatment of materials.
- Signs must be posted in prominent locations showing hours of business, owner's name and emergency telephone number.
- Only trained employees may be allowed to operate and maintain equipment; all employees must be trained in emergency procedures.
- Waste cannot begin to be accepted at the site unless, at least 90 days prior to its receipt, written notice has been given to the clerk of the municipality (local or upper tier), property owners within 120 m of the site, and the Ministry of Environment and Energy. But if the site does not *actually* begin operation within 180 days after the initial start-up notice is given, a new notice is

required.

- Reasonable care must be exercised to prevent access by unauthorized persons.
- All site areas for roads, parking, loading and unloading must be maintained in good condition.
- Municipal waste recycling sites owned by or operated on behalf of a municipality also must submit annual reports to the ministry, describing the amount of materials accepted at the site, the amount reused or recycled, and the amount of residual wastes sent to disposal.

Leaf and yard waste composting sites

Leaf and yard waste composting sites are the central facilities to which source separated leaf and yard materials are accepted only for composting. The wastes that the sites accept are limited to common lawn and garden materials, such as leaves, brush, tree trimmings or grass clippings. Food wastes from the kitchen are not allowed.

A leaf and yard waste composting site is exempt from obtaining a Certificate of Approval for *waste disposal* and for *air emissions*, if buildings, processing areas and storage areas are located at least 100 metres from the site boundary and any body of water or water course. Once in operation, the site must meet certain requirements. There are also specific quality control requirements for the use of the finished compost.

Operational requirements

- Most operational requirements that apply to municipal waste recycling sites apply also to leaf and yard composting sites.
- Leaf and yard waste may be stored for no more than four days before it is composted. Total amount of compost on site shall not exceed 18 times the capacity for material that the site is designed to process in a month.
- Temperature of the compost mass in an aerated static pile or windrow composting system must be at least 55° C for at least 15 days; and at least 55° C for at least three days in an in-vessel system.
- Windrow must be turned at least five times at regular intervals after the temperature reaches 55° C; the temperature must be maintained after

the fifth turning.

- There must be a six-month curing period; during this period the compost mass must be turned at least once a month.
- Records which must be maintained for at least three years must include daily temperatures of the composting mass (weekly while curing), operational and processing procedures, public complaints and responses, and laboratory analysis of samples; records for each shipment of finished compost, which must be maintained for at least 10 years, must include the name, address, and telephone number of each person who receives the shipment.
- Finished compost must be sampled and analyzed before leaving the site.

Use of finished compost material

To ensure the finished compost is put to the best end use, the regulation allows for three categories of use: unrestricted, controlled, and disposal as waste. The allowable end use is determined by the quality of the finished compost. The quality is measured by analyzing for the concentrations of certain metals and non-organic matter.

- Unrestricted use: Finished compost meets strict quality criteria and is not subject to the EPA. This compost may be freely used in an agricultural or gardening activity.
- Controlled use: Finished compost meets less strict quality criteria. This compost is designated a waste under the EPA and can be used only under prescribed conditions without a Part V approval. The uses are restricted to limited urban land applications which will not elevate soil metals content beyond specified concentrations or as cover material for landfills.
- Disposal: Finished compost is a waste if it fails to meet the quality criteria. This compost can only be disposed of at certified waste disposal sites.

Municipal waste recycling depots

Municipal waste recycling depots are locations at which an owner will accept source separated materials but does not process any of the materials. The operator will simply provide containers into which materials are deposited and once full the containers are transported to other recycling sites. Recycling depots typically serve the general public and are a common part of a small municipality's source separation system.

To be exempt from obtaining a waste disposal site Certificate of Approval, a municipal waste recycling depot must have all buildings and storage areas at least 50 metres from its property line.

Operational requirements

The following requirements apply to municipal recycling depots:

- Only recyclable materials listed in the schedules to the regulation are accepted and may be transferred only to:
 - Municipal waste recycling site
 - End-user
 - Distributor
 - Waste disposal site
- Signs must be posted instructing the public on what materials are accepted, how they must be source separated and where they must be deposited. The signs also must identify the person who is responsible for the depot and provide contact names and telephone numbers.
- Suitable number and type of containers, and proper security, litter control and collection schedule must be maintained.

Other exemptions from Part V, Environmental Protection Act

Integrated recycling sites

These are municipal waste recycling sites located at a manufacturing facility that uses the output of the recycling site in its manufacturing process. These sites are exempt from Part V, *Environmental Protection Act*.

Municipal waste recycling depots

All municipal waste recycling depots with a total waste storage capacity of less than 200 m³ are exempt from Part V, EPA and the *3Rs regulations*. All waste at these sites must be removed at least every thirty days.

Source separated recyclable materials

Source separated materials (not commingled) that are shipped directly from a waste generator to an end user are exempt from Part V, EPA, and Regulation 347. In other words, these materials are not considered to be waste. They are incorporated into a finished product at the site where they are received.

For more information

- To help you answer questions on the 3Rs regulations: call 323-5898 in the Toronto dialling area or 1-800-565-4860 toll free long distance.
- To order unofficial copies of the 3Rs regulations, more copies of this backgrounder or copies of the forthcoming compliance guides (available August 1993), complete the enclosed reply card and mail to:

3Rs REGULATIONS

Ministry of Environment and Energy
Communications Branch
135 St. Clair Ave. W., 2nd floor
Toronto, Ontario M4V 1P5



PIBS 2474e Revised
Printed on recycled paper